
**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**


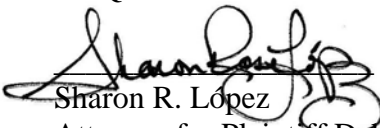
George Patterson,	:	
Plaintiff	:	Case No. 10-cv-996
	:	(Hon. Judge Lawrence Stengel)
v.	:	
Bernard Avernoe d/b/a Freedom Used Cars	:	
Defendants.	:	

PLAINTIFF'S MOTION FOR LEAVE TO FILE A REPLY BRIEF

Plaintiff Patterson, by and through his counsel, Sharon R. López and **TRIQUETRA LAW**, moves this Court to permit him to file a reply brief to Defendant's Response to Plaintiff's First Motion to Amend his Complaint pursuant to Fed. R. Civ. P. 15(a)(2). In support, Plaintiff, through counsel, declares that:

1. Defendant raised objections to the Motion to Amend that require legal response.
2. Defendant claims he is prejudiced by new legal claims, but Plaintiff merely cited the wrong statute so no new legal theory is added to Plaintiff's Amended Complaint.
3. Defendant claims the proposed Amendment is unduly late but Plaintiff did not have improper motive in filing the Amended Complaint when he did.

Dated: January 15, 2011

Respectfully submitted:
 **TRIQUETRA LAW®**

Sharon R. Lopez
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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

George Patterson	:	Civil Action
Plaintiff,	:	
	:	No. 10-cv-996 – LS
v.	:	
	:	Jury Trial Demanded
Bernard Avernebe d/b/a	:	
Freedom Used Cars	:	
Defendant.	:	

PROPOSED ORDER

AND NOW, this _____ day of _____, 2011, after consideration of the plaintiff's motion for leave to file a reply brief, it is hereby **ORDERED** that the motion is **GRANTED**.

BY THE COURT:

Lawrence F. Stengel, J.
United States District Court

**IN THE UNITED STATES DISTRICT COURT
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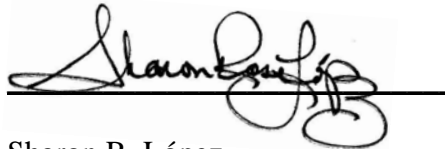
George Patterson	:	Civil Action
Plaintiff,	:	
	:	
v.	:	No. 10-cv-996 – LS
	:	
Bernard Avernoe d/b/a	:	Jury Trial Demanded
Freedom Used Cars	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, Sharon R. López, Esquire, counsel for the Plaintiff, George Patterson, hereby certify that the foregoing is available for viewing and downloading via ECF and I served a copy of the foregoing motion and proposed Order to Counsel for the Defendant at the following address:

Richard A. Polachek, Esquire
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Counsel for the Defendant

Respectfully submitted,
 **TRIQUETRA LAW®**



Dated: January 15, 2011

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